

# Exhibit A

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Attorneys for Defendants C. R. Bard, Inc. and  
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability  
Litigation,

No. MD-15-02641-PHX-DGC

**SUPPLEMENTAL RESPONSES TO  
PLAINTIFFS LISA AND MARK  
HYDE'S FIRST SET OF  
REQUESTS FOR ADMISSION TO  
BARD PERIPHERAL VASCULAR,  
INC.**

LISA HYDE and MARK HYDE, a married  
couple,

Plaintiffs,

v.

C.R. BARD, INC., a New Jersey  
corporation and BARD PERIPHERAL  
VASCULAR, an Arizona corporation,

Defendants.

**SUPPLEMENTAL RESPONSES AND OBJECTIONS TO REQUESTS FOR**  
**ADMISSION**

Defendant Bard Peripheral Vascular, Inc. (referred to herein as “Bard,” “BPV,” or “Defendant”) hereby serves the following Supplemental Responses and Objections to Plaintiffs Lisa Hyde’s and Mark Hyde’s First Set of Requests for Admissions to Bard Peripheral Vascular, Inc. as follows:

**REQUEST FOR ADMISSION NO. 1:**

Admit that Plaintiff was implanted with a G2X IVC Filter on February 25, 2011.

**RESPONSE:**

Defendant objects to this Request on the grounds that it is untimely as described fully in Defendant’s Preliminary Statement and Objection, which is incorporated herein by reference.

**SUPPLEMENTAL RESPONSE:**

Defendant states that the information known or readily obtainable to Defendant is insufficient to enable it to admit or deny this Request after reasonable inquiry. The sales history of Bard IVC filters to Wheaton Franciscan Healthcare, Franklin during the relevant time period shows that Plaintiff was likely treated with an Eclipse filter. Defendant has not had an opportunity to inspect the subject filter, as a result Defendant cannot admit that Plaintiff was implanted with a G2X filter.

**REQUEST FOR ADMISSION NO. 2:**

Admit that you were the manufacturer of the G2X IVC Filter implanted in Plaintiff on February 25, 2011.

**RESPONSE:**

Defendant objects to this Request on the grounds that it is untimely as described fully in Defendant’s Preliminary Statement and Objection, which is incorporated herein by reference.

**SUPPLEMENTAL RESPONSE:**

Defendant admits that C. R. Bard was the manufacturer of the IVC filter that was

1 implanted in Plaintiff. Defendant states that the information known or readily obtainable  
2 to Defendant is insufficient to enable it to admit or deny this Request after reasonable  
3 inquiry. The sales history of Bard IVC filters to Wheaton Franciscan Healthcare, Franklin  
4 during the relevant time period shows that Plaintiff was likely treated with an Eclipse  
5 filter. Defendant has not had an opportunity to inspect the subject filter, as a result  
6 Defendant cannot admit that Plaintiff was implanted with a G2X filter.

7 **REQUEST FOR ADMISSION NO. 3:**

8 Admit that you were the seller of the G2X IVC Filter implanted in Plaintiff on  
9 February 25, 2011.

10 **RESPONSE:**

11 Defendant objects to this Request on the grounds that it is untimely as described  
12 fully in Defendant's Preliminary Statement and Objection, which is incorporated herein  
13 by reference.

14 **SUPPLEMENTAL RESPONSE:**

15 Defendant admits that BPV was the original seller of the IVC filter to Wheaton  
16 Franciscan Healthcare, Franklin that was implanted in Plaintiff. Defendant further states  
17 that the information known or readily obtainable to Defendant is insufficient to enable it  
18 to admit or deny this Request after reasonable inquiry. The sales history of Bard IVC  
19 filters to Wheaton Franciscan Healthcare, Franklin during the relevant time period shows  
20 that Plaintiff was likely treated with an Eclipse filter. Defendant has not had an  
21 opportunity to inspect the subject filter, as a result Defendant cannot admit that Plaintiff  
22 was implanted with a G2X filter.

23 **REQUEST FOR ADMISSION NO. 4:**

24 Admit that you provided or sold to Wheaton Franciscan Healthcare – Franklin  
25 Hospital in Franklin, WIX the G2 IVC Filter that was implanted in Plaintiff on  
26 February 25, 2011.

27 **RESPONSE:**

28 Defendant objects to this Request on the grounds that it is untimely as described

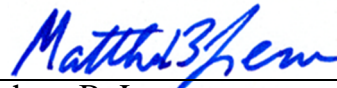
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the above and foregoing has been served by First Class postage prepaid U.S. Mail on August 21, 2017, to the following:

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